

**Federal Defenders  
OF NEW YORK, INC.**

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March 18, 2022

*Via ECF*

The Honorable John G. Koeltl  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED

  
John G. Koeltl, U.S.D.J.

3/18/22

Re: *United States v. Franklin Bello Jimenez*, 22 CR 133 (JGK)

Dear Judge Koeltl:

With the consent of both Pretrial Services and the government, I write to request a modification of the conditions of Mr. Bello Jimenez's release to extend his travel limits to include New Jersey so that he can seek and maintain employment there.

On February 17, 2022, Mr. Bello Jimenez was presented and released on an agreed-upon bail package which included, *inter alia*, restrictions on his travel to the Southern and Eastern Districts of New York. However, Mr. Bello Jimenez previously has worked in New Jersey and would like to seek employment there again. Accordingly, we ask that his travel be extended to include the District of New Jersey. All parties consent.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Julia Gatto

Julia L. Gatto  
Assistant Federal Defender  
(212) 417-8750

cc: AUSA Sarah Kushner (via ECF)  
USPO Evelyn Alvayero (via email)